

LINCOLN SQUARE LEGAL SERVICES, INC.

Fordham University School of Law  
150 West 62nd Street, Ninth Floor  
New York, NY 10023

Tel 212-636-6934  
Fax 212-636-6923

May 28, 2023

**VIA EMAIL AND ECF**

The Honorable Katherine Polk Failla  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *United States. v. Esteban Cabrera Da Corte, et al.*, 22-CR-437 (KPF)

Dear Judge Failla:

We represent Mr. Asdrubal Ramirez Mesa in the above-referenced action. With the Government's consent, all defense counsel seek a 45-day adjournment of the briefing schedule, previously set during the February 15, 2023 conference, to permit continued discussions of potential pre-trial dispositions in the above-referenced matter. The proposed alternative deadlines for pre-trial motions would be:

- May 15, 2023 for Defendants' Pretrial Motions;
- June 15, 2023 for the Government's Opposition; and
- June 30, 2023 for Defendants' Reply.

The conference/potential hearing date currently scheduled for May 24 at 11:00am would be adjourned to a date in mid-July or as soon thereafter as would be convenient to the Court.

Thank you for your consideration.

Respectfully submitted,

/s/

Michael W. Martin, Esq.  
Lincoln Square Legal Services, Inc.  
*Counsel for Asdrubal Ramirez  
Mesa*

cc: Emily Deininger  
Assistant United States Attorney (S.D.N.Y.)  
By Email and ECF

Oscar S. Rodriguez, Esq.  
Counsel for Esteban Cabrera da Corte  
By Email and ECF

Bijan Parwaresch, Esq.  
Counsel for Luis Hernandez Gonzalez  
By Email and ECF